

FLYNN/WALTERS/CLARK COLLUSION

FLYNN/WALTERS

12/79 Kevin or Michael Flynn calls Tonja Burden and asks that she come to Boston to discuss her situation with them, telling her that her name was given to them by Eddie Walters

21/12/79 Denise Cote, AUSA in New York, contacts Flynn regarding having Tonja Burden testify before a grand jury looking into "Operation Freakout"

21/12/79 (Approx) Paulette Cooper visits Walters after he calls her, or she calls him, to locate potential witnesses for her suit

21/12/79 Ernie Hartwell refuses a settlement offer and tells the AGLV that he has an attorney, giving him a piece of paper with Michael Flynn's name on it

26/12/79 Kevin Flynn and Tom Hoffman meet with Walters, the Hartwells, Clair Bryner, Jack Chancellor, Bill Broderick, Don Cooper, the Herrons, Tom Jefferson and Debbie Keck to solicit clients for the class action suit

27/12/79- 1/80 Walters urges those who attended the meeting of 26/12 to quickly complete their affidavits for Flynn

9/1/80 Kevin Flynn writes Walters to thank him for his hospitality while Flynn was in Las Vegas

16/1/80 Michael Flynn is collecting affidavits from Walters, Ann Rosenblum, et al

18/1/80 Michael Flynn writes Raymond Banoun to retrieve Walter's files and tape earlier supplied to FBI Special Agent Varley

20/1/80 (Approx) Flynn's office refers Dennis Quilligan of the Florida State Attorney General's Office to Walters

24/1/80 Walters calls a meeting of the LV disaffecteds to meet with Quilligan and two others from the Fla. State AG's Office

24/1/80 Flynn sends affidavits to Jefferson and the Herrons to be signed

29/1/80 Fred Salas, a former Scientologist and friend of Walters who has previously gone to the BBB with Walters, tells John Burger of a plot by 150-170 people to get at least 200 people to file suit against the Church and LRH for a minimum of \$200 million, to put the Church into receivership by federal court order, and to put LRH in a position of responsibility for the actions of staff so that he can be directly sued



2/80 (Approx) Bill Broderick is introduced to Michael Flynn by Kevin Flynn with little response until he is identified as a friend of Eddie Walters

2/80 C of S Nevada files suit against Van Schaick, Walters, Kevin Flynn and Hoffman for conspiracy

14/2/80 Michael Flynn is representing the defendants in the C of S Nevada suit

3/80 (Approx) Walters claims to be constantly in touch with Flynn and knows about the filing of Burden's suit before it is filed, and is also knowledgeable about ongoing actions in Riverside

3/80 (Approx) Flynn's office refers NBC-TV's Prime Time to Walters for a show about Apple School and Scientology

18/4/80 Walters calls a meeting to instigate fundraising for the Class Action Fund after Clair Bryner receives a call on this from Flynn and most of the LV disaffecteds have received letters requesting funds from Van Schaick

24/4/80 The Class Action Fund account was opened with Kevin Flynn as sole signatory

30/6/80 Burden claims Flynn told her to stay away from Walters as Walters continued to audit people and Flynn did not trust him

Summer 1980 Michael Flynn put Ann Rosenblum in touch with Walters when she wanted to reach Tonja Burden

Summer 1980 Debbie Keck first met with Michael Flynn in a meeting between Walters and Flynn at the Sands Hotel

7/80 (Approx) Walters claims to be working with Michael Flynn and the FBI on plans to raid the Flag Land Base

16/7/80 Tom Findley of ABC-TV San Francisco contacts Flynn to get data on Walters, Wollersheim and Rosenkjar. This same report states that all three are also connected to ex-Scientologist and deprogrammer Joey Flanagan, who is deprogramming for Kevin Flynn

8/80 Walters puts Carol Garrity and Janie Peterson in touch with Flynn

6/8/80 Walters is reported to be in close communication with Tom Hoffman of Flynn's office

18/8/80 Walters introduces Michael Flynn and Sherman Fredericks of the Las Vegas Review-Journal

8/80 (Approx) Martin Cohen, IRS lead counsel in their suit against the Church, is given Walter's name as a potential witness by Flynn's office



16/9/80 Walters is reported to have been in touch with Flynn recently after returning from Tampa where he was ready to testify, if needed, before the Tampa Grand Jury

11/80 Joey Flanagan is referred to the Brothers family by Kevin Flynn and attempts a deprogramming on Byron Brothers, which fails, so he then refers the Brothers family to Walters

5/11/80 Michael Flynn is reported to be still upset with Walters for his continuing to audit

12/80 (Approx) Kevin Flynn refers Bernard Miller to Walters, stating that Steve Miller should visit Walters following his planned deprogramming

1/81 (Approx) Walters testifies for the IRS in their suit against the Church regarding the 1970-72 tax exemptions

29/1/81 Flynn's "Class Action Case Development Program" states "Most of the individuals testifying in that case (the IRS 1970-72 case) are our clients".

1/81 (Approx) Flynn's agendas for the March and May 1981 conferences planned for soliciting co-counsel in the Scientology suits list press created by Walters in the Las Vegas Review-Journal as having been created by or for them

10/2/81 (Approx) Steve Miller is sent to Walters following a failed deprogramming attempt by Joey Flanagan which had been orchestrated by Kevin Flynn

26/2/81 Walters is pushing hard for people to sign up with Flynn, claiming that the Church is about to go under and wants to settle with Flynn, and that settlement talks are ongoing

4/7/81 (Approx) Walters met with Attorney Greg Hull, Flynn's associate attorney from San Francisco, when Hull interviewed Debbie Keck to decide if he would take her suit on. Walters then became Hull's Scientology "consultant" for the suit.

7/9/81 Walters called Pam Kemp, a Scientology Mission Holder, and gave her his viewpoint on the status of the various damages suits which she then began to spread around, using Flynn's name

12/81 Walters is contacted by Scientologist Artie Maren and sees Maren even though Flynn has advised him not to

11/2/82 Walters referred Bob Boyers to Flynn

3/3/82 Brown McKee, a disaffected former Mission Holder, is referred to Walters by Flynn

11/3/82 Ann Basile and Rosie Pace, disaffected Scientologists referred to Walters by Brown McKee, are referred to Flynn



3/82 (Approx)	Lori Taverna, a disaffected Scientologist, called <u>Reader's Digest</u> , was somehow put in touch with Brown McKee, and was then somehow referred to Walters. (She then ends up on Flynn's lines and testifies at the Clearwater City Commission Public Hearings.)
19/3/82	Peter Greene, another disaffected Mission Holder, starts spreading the line that another 32 suits at \$150,000 to \$200,000 each are soon to be filed and states that he got this data from Walters
12/4/82	Scott Foster, a disaffected Scientologist, is referred to Flynn by either Brown McKee or Walters
5/5/82	Walters was the first witness called at the Clearwater City Commission Public Hearings moderated by Flynn
10/5/82	Scientologist John Bostrum speaks to Flynn and Walters and then returns to tell the Flag GO that what they are doing is really the right answer to preserving the technology
22/5/82	Walters and Flynn are the two main speakers at a Scientology Victims Defense Fund rally in Clearwater
29/5/82	Flynn is reported to be planning an "Open Forum" in Los Angeles which will include Walters as a speaker

The foregoing is a time track of those actions in which Michael Flynn, or his associates, and Eddie Walters are known to have collaborated or worked together.

A few of the more salient points brought out by this are:

1) All parties concerned have testified in deposition that Tonja Burden was referred to Flynn by Walters, and Flynn has stipulated in one of Burden's depositions that he first contacted her in "about December 1979". However, all parties have also stated that the meeting of 26 December 1979 was the first contact made between Flynn and the group of former Scientologists in Las Vegas. This time track shows that latter statement to be false and opens up the question of just exactly how long Walters was working with Flynn prior to that meeting and what role did he play in setting it up.

2) Walters completed an affidavit for Flynn himself, along with ensuring that everyone else in Las Vegas did so also. He was also responsible for at least the Hartwell, Peterson, Jefferson, Garrity, Burden and Keck suits being filed against the Church -- yet he did not file a suit of his own. This brings up the question as to why he has not filed a suit against the Church even though he has urged so many others to do so, and what financial arrangements or agreements he may have made or received from Flynn or Hull for his work in forwarding all of these clients and assisting on the Keck case as a consultant.

3) Fred Salas, a confidante of Walters, made comments in January 1980 which closely paralleled the "Class Action Development Program" put into



writing by Flynn in January 1981. The parallel in statements is too close for sheer coincidence and raises the questions of how long these plans had been in existence and what part, if any, Walters had played in formulating them. This also throws doubt on the claims that Walters did not connect up with Flynn prior to late December 1979 as it is not credible to believe that Walters would be in possession of such data after just one month of familiarity with Flynn.

4) In addition to the straightforward soliciting of clients for Flynn, as is obvious and has been covered in the instigation and organization section on Walters, this time track makes more clear his role in soliciting through deprogramming along with Kevin Flynn and Joey Flanagan.

5) Beginning in December 1981, with a conference of Mission Holders at the Flag Land Base, the Scientology field has been disrupted by attempted rebellions against management and attempted, but unsuccessful, schisms or "reform" churches. Walters contacts with Pam Kemp in September 1981, prior to that first conference, and with Peter Greene and Brown McKee in 1982, lead to the question of his involvement, if any, in these upsets. It is already known that Dr. John Clark had inside information on these upsets, and that he felt they had occurred too soon, so the addition of Walters to this picture raises some definite questions. The recent actions in the field, dealing with the revitalization of defunct Dianetic associations by persons connected to the Mission Holders upsets, which have reportedly been associated with Flynn, further add to the need to determine in more detail any role Walters has or had.

While the above raises a few questions it also, in conjunction with the section regarding Walter's individual organization and instigation of damages attacks on the Church, answers the questions as to Walters involvement, and involvement with Flynn, with a definite affirmative.